

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION		
ROBERT DEDMON, Plaintiff	§ § § § § § § § § §	CIVIL ACTION NO. 4:21-cv-03371
v.		
SHELL EXPLORATION & PRODUCTION COMPANY AND SHELL TRADING SERVICES COMPANY, Defendants		JURY DEMANDED

DEFENDANTS' FIRST AMENDED TRIAL WITNESS LIST

No.	WITNESS NAME	WITNESS ADDRESS
1.	Robert Dedmon	c/o Amy Gibson and David Wiley, Gibson Wiley PLLC 1500 Jackson Street, #109 Dallas, Texas 75201
	<div style="display: flex; justify-content: space-between;"> <input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition </div> <div style="display: flex; justify-content: space-between;"> <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian </div> <p><i>Brief description of witness capacity and testimonial topics:</i></p> <p>Mr. Dedmon is the Plaintiff in this case and will provide testimony regarding his claims in this case, including his hiring, compensation, job grade, and employment, as well as other topics relating to allegations in Plaintiff's First Amended Complaint.</p>	
2.	Michael Tickle	c/o Marlene Williams, Ogletree, Deakins, Nash, Smoak & Stewart, P.C., 500 Dallas Street, Suite 2100, Houston, TX 77002
	<div style="display: flex; justify-content: space-between;"> <input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition </div> <div style="display: flex; justify-content: space-between;"> <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian </div> <p><i>Brief description of witness capacity and testimonial topics:</i></p> <p>Mr. Tickle was Plaintiff's supervisor during a significant period of his employment. Mr. Tickle will provide testimony about Plaintiff's performance, compensation, job grade, and employment, and the performance, compensation and job grade classifications of Plaintiff's peers during the relevant time period, as well as other topics relating to the allegations in Plaintiff's First Amended Complaint.</p>	

3.	Jennifer Hartnett	c/o Marlene Williams, Ogletree, Deakins, Nash, Smoak & Stewart, P.C., 500 Dallas Street, Suite 2100, Houston, TX 77002
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian <i>Brief description of witness capacity and testimonial topics:</i> <p>Ms. Hartnett was involved in Plaintiff's hiring and was a supervisor during a portion of his employment. Ms. Hartnett will provide testimony about Plaintiff's performance, compensation, job grade, and employment during the period that she was his supervisor, as well as other topics relating to the allegations in Plaintiff's First Amended Complaint.</p>	
4.	Erin Verdon	c/o Marlene Williams, Ogletree, Deakins, Nash, Smoak & Stewart, P.C., 500 Dallas Street, Suite 2100, Houston, TX 77002
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian <i>Brief description of witness capacity and testimonial topics:</i> <p>Ms. Verdon is VP of HR in Trading and Supply at Shell and will provide testimony about certain of Defendant's policies and procedures related to Plaintiff's performance, compensation, job grade, and employment, as well as other topics relating to the allegations in Plaintiff's First Amended Complaint.</p>	
5.	Michael Deley	c/o Marlene Williams, Ogletree, Deakins, Nash, Smoak & Stewart, P.C., 500 Dallas Street, Suite 2100, Houston, TX 77002
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian <i>Brief description of witness capacity and testimonial topics:</i> <p>Mr. Deley was one of Plaintiff's colleagues during a portion of his employment at Shell. Mr. Deley will provide testimony about the open JG4 position at Shell in 2021 and his application for the position, as well as other topics relating to the allegations in Plaintiff's First Amended Complaint.</p>	
6.	Christopher Riley	c/o Marlene Williams, Ogletree, Deakins, Nash, Smoak & Stewart,

		P.C., 500 Dallas Street, Suite 2100, Houston, TX 77002
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian <i>Brief description of witness capacity and testimonial topics:</i> <p>Mr. Riley was a manager over Plaintiff's department for a portion of Plaintiff's employment. Mr. Riley will provide testimony about Plaintiff's performance, compensation, job grade, and employment, as well as other topics relating to the allegations in Plaintiff's First Amended Complaint.</p>	
7.	Teri Omen 3003 Eagle Ridge Way Houston, Texas 77084	
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian <i>Brief description of witness capacity and testimonial topics:</i> <p>Ms. Olmen is a former Human Resources professional at Shell. Ms. Olmen will provide testimony about events related to Plaintiff's application for employment and hiring in 2014, Shell's job grade classifications and compensation in Plaintiff's group in 2014, as well as other topics relating to the allegations in Plaintiff's First Amended Complaint.</p>	

Respectfully submitted,

/s/ Marlene C. Williams

Marlene C. Williams

State Bar No: 24001872

OGLETREE, DEAKINS, NASH,

SMOAK & STEWART P.C.

500 Dallas Street, Suite 2100

Houston, Texas 77002-4709

(713) 655-5750

(713) 655-0020 (Fax)

marlene.williams@ogletreedeakins.com

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on March 6, 2025, I electronically submitted the foregoing document with the clerk of the court for the U.S. District Court, Southern District of Texas – Houston Division, using the electronic case files system of the court. The electronic case files system sent a “Notice of Electronic Filing” to the following CM/ECF participants:

Ms. Amy E. Gibson
amy@gwfirm.com
Mr. David L. Wiley
david@gwfirm.com
Gibson Wiley PLLC
1500 Jackson Street #109
Dallas, Texas 75201-4923

Ms. Amanda C. Hernandez
amanda@ahfirm.com
AH Law, PLLC
5718 Westheimer, Suite 1000
Houston, Texas 77057

/s/ Marlene C. Williams
Marlene C. Williams